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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURIELLE YVETTE AVILES,

Defendant.

Case No. 3:20-cr-00453-IM

**DECLARATION OF
RYAN COSTELLO IN SUPPORT OF
UNOPPOSED MOTION TO CONTINUE
TRIAL DATE**

I, Ryan Costello, declare:

1. I am the attorney appointed to represent Laurielle Yvette Aviles in the above-entitled case.

2. Jury trial in this case is currently scheduled for April 6, 2021. Laurielle Aviles was arraigned on the indictment on October 8, 2020. This is the second continuance sought by the defense.

3. Laurielle Aviles is currently on release and in compliance with the conditions thereof.

4. Laurielle Aviles has received discovery and the defense is conducting investigation in this case, including obtaining information relating to circumstances of the offense and Laurielle Aviles's background. This information relates to pretrial litigation, trial, and sentencing. Laurielle Aviles therefore respectfully requests that this Court continue the trial for a period of approximately 120 days to August 3, 2021, or a date thereafter convenient to the Court to accomplish these tasks.

5. I have discussed Laurielle Aviles's right to a speedy trial with Laurielle Aviles. Laurielle Aviles agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act. Assistant United States Attorney Thomas Ratcliffe has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on March 23, 2021, in Portland, Oregon.

/s/ Ryan Costello

Ryan Costello
Assistant Federal Public Defender